

DISTRICT OF MASSACHUSETTS

MEDDAHI BOUDGEMAA
#A76H91084 PETITIONER

VS.

Joseph E. McDonough
Sheriff of Plymouth
County Jail
Department of Homeland
Security

RESPONDENT

APPLICATION FOR FEDERAL WRIT OF
HABEAS CORPUS UNDER 28 USC 2241

I AM PRESENTLY CONFINED AT THE PLYMOUTH
COUNTY JAIL.

THE BASIS OF MY PETITION IS ABOUT CONTINUED
DETENTION BY THE DEPARTMENT OF HOMELAND SECURITY

THE DHS DOES NOT HAVE AUTHORITY TO DETAIN
ME INDEFINITELY. THIS MY DETENTION IS UNLAWFUL.

THIS IS BECAUSE MY REMOVAL CANNOT BE
COMPLETED IN THE NEAR FUTURE.

ZADUYDAS V. DAVIS 533 U.S. 678 (2001)

(1) I WAS ORDERED DEPORTED ON 11-22-99

I HAVE GIVEN THE DHS ALL THE INFORMATION THEY
NEED IN ORDER TO GET MY TRAVEL DOCUMENTS. PLACE OF
BIRTH, DATE OF BIRTH, YEAR I ENTERED INTO THE UNITED
STATES, FINGER PRINTS AND PHOTO.

(2) I RECEIVED A LETTER FROM INS SAYING THAT, I WILL BE DEPORTED TO GERMANY ON 9-25-03 AND SELF SURRENDERED VOLUNTARILY TO INS FOR MY DEPORTATION ON 9-25-03

(3) I HAVE BEEN IN DETENTION SINCE THEN WITHOUT BEING DEPORTED

(4) MY DETENTION IS IN VIOLATION OF MY RIGHTS

(5) AFTER THREE MONTHS FROM THE DATE OF MY SURRENDER, I RECEIVED A LETTER STATING THAT MY DETENTION WILL BE CONTINUED

(6) I HAVE EXHAUSTED MY ADMINISTRATIVE REMEDIES BY REQUESTING FOR RELEASE FROM DEPORTATION OFFICER IN BOSTON AND THE HEAD QUARTERS IN WASHINGTON AND THUS MY LAST OPTION IS THIS JUDICIAL ACTION

(7) I ALSO BELIEVE THAT MY DETENTION IS UNLAWFUL ACCORDING TO 8.C.F.R. 2414

(8) I DO HAVE A WIFE AND A NEW BORN BABY WHO IS WILLING TO SUPPORT ME WHEN I AM RELEASED

(9) I WILL AVAIL MYSELF TO THE DHS ANYTIME EXPECTED UNTIL MY REMOVAL IS IMMIMENT. I AM WILLING TO ABIDE WITH ALL THE CONDITIONS IMPOSED ON ME UPON RELEASE

I DECLARE UNDER PENALTY OF PERJURY THAT, THE FORE GOING IS TRUE AND CORRECT.

THANK YOU, FOR TAKING THE TIME TO REVIEW
THIS LETTER.

X

MEDDAHI BOUDGEMAA

26 LONG POND R.D

Plymouth, MA 02360 pccf

DATE: MARCH, 29, 04